

MEMO ENDORSED

K&L GATES

The application is X granted
_denied



October 22, 2021

Edgardo Ramos, U.S.D.J.
Dated: October 22, 2021
New York, New York 10007

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By ECF

The Honorable Edgardo Ramos
United States District Court for the Southern
District of New York
40 Foley Square
New York, NY 10007

Re: *Bodum Holding AG et al. v. Starbucks Corporation*, Case No. 1:19-cv-04280-ER

Dear Judge Ramos:

We represent Defendant Starbucks Corporation (“Starbucks” or “Defendant”) in the referenced action.

In connection with our concurrent letter (the “Clawback Dispute Response Letter”) in which Starbucks further contests Bodum’s assertion of privilege with respect to a specific document (the “Email”), we write to respectfully request permission to redact the portions of the Clawback Dispute Response Letter that reference the Email, file a redacted copy on the public docket, and to file an unredacted copy under seal. Starbucks makes this request pursuant to Paragraph 21(a)(i) of the Stipulated Confidentiality Agreement and Protective Order (ECF No. 42), which provides that to the extent that it is necessary to submit a dispute regarding the assertion of privilege to the Court, “the Receiving Party shall seek leave to file the contested document(s) and/or ESI under seal in accordance with the procedure set forth in Paragraph 17.” The Court previously granted the first letter Starbucks submitted in connection with the parties’ clawback dispute. *See* ECF No. 133.

Accordingly, pursuant to Paragraphs 17 and 21 of the Stipulated Confidentiality Agreement and Protective Order, Starbucks respectfully requests permission to redact the portions of its Clawback Dispute Response Letter that reference the Email. Defendant’s proposed redactions are highlighted in the unredacted Clawback Dispute Response Letter.

Respectfully submitted,

/s/ Joanna A. Diakos

Joanna A Diakos